

June 20, 2016

Steve Guest President Central Cellular L.L.C., dba COTC Connections 223 Broadway, PO Box 789 Davenport, OK 74026

Marlene H. Dortch Secretary Federal Communications Commission 445 12<sup>th</sup> Street, SW Washington, D.C. 20554

#### **RE: REQUEST FOR CONFIDENTIAL TREATMENT:**

Connect America Fund; High Cost Universal Service Support IN WC DOCKET NOS. 10-90, 07-135, 05-337, 03-109, CC DOCKET NOS. 01-92, 96-45, GN DOCKET NO. 09-51, WT DOCKET NO. 10-208, BEFORE THE FEDERAL COMMUNICATIONS COMMISSION

#### Dear Ms. Dortch:

Please find attached with this letter a request for confidential treatment for portions of information submitted with our company Form 481. Two copies of the redacted Form 481, with redacted attachments, filed on behalf of our company. Contemporaneously, we are filing two copies of the redacted Form 481, with redacted attachments, filed on behalf of our company. An un-redacted copy, stamped confidential, has been sent to the Secretary's office. This information has also been filed with our state commission and electronically submitted, and certified, with the Universal Service Administration Company. If you have any questions or concerns with the attachments, please contact Charles Curtis at <a href="mailto:Charles.curtis@contaegis.com">Charles.curtis@contaegis.com</a> or by phone at 252-514-2203.

Sincerely,

Steve Guest

Cc: file

223 Broadway • P.O. Box 789 • Davenport, OK 74026 • (918) 377-2424 • 1-866-491-2424 • www.connectstroud.com

## Before the FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20554

	0 ,	
In the Matter of	)	
Connect America Fund	)	WC Docket No. 10-90
	)	WC Docket No. 07-135
High-Cost Universal Service Support	)	WC Docket No. 11-42
	)	WC Docket No. 05-337
Lifeline and Link Up Reform	)	WC Docket No. 03-109
*	)	CC Docket No. 01-92
	)	CC Docket No. 96-45
	)	GN Docket No. 09-51
	)	WT Docket No. 10-208

#### REQUEST FOR CONFIDENTIAL TREATMENT

Central Cellular L.L.C., dba COTC Connections ("Filer") requests that the portions of its Form 481 pertaining to its Five Year Plan in the Service Quality Improvement Reporting, its Tribal Land Offerings documentation and its Rate of Return Additional Documentation (RUS Annual Report) be granted confidential, non-public treatment pursuant to Sections 0.457 and 0.459 of the Commission's rules, 47 C.F.R. Sections 0.457, 0.459, and related provisions of the Freedom of Information Act ("FOIA"), including 5 U.S.C. Section 552(b)(4) ("Exemption 4"). Form 481 contains information regarding the Filer's capital expenditure budgets, detailed network information, corporate affiliations, strategic service offerings with Tribal Governments as well as sensitive financial information filed in the Rate of Return Documentation. Release of such information would supply its competition sensitive commercial information that would undermine its ability to serve its customers effectively. Such information is not customarily disclosed to the public or made available within the telecommunications industry. Therefore, the Filer requests confidentiality of these respective portions of its Form 481 filing be granted. Support for the Filer's request for confidential treatment pursuant to FCC rules in Section 0.459(b) is provided as follows:

### I. FILER'S FORM 481 SATISFY THE REQUIREMENTS OF SECTION 0.459 OF THE COMMISSION'S RULES

The material the Filer seeks confidentiality qualifies for the requirements outlined in Section 0.459 if the FCC's rules. As will be demonstrated, the Filer has satisfied all the elements of this section, concluding that disclosure of this information would be harmful to the Filer.

(1) Identification of the specific information for which confidential treatment is sought. The Filer requests confidential treatment for the portions of the Form 481 required by 47 C.F.R. Section 54.313(a)(2) and (4). The Form bears the legend "CONFIDENTIAL INFORMATION SUBJECT TO PROTECTIVE ORDER IN WC DOCKET NO.'S 10-90, 07-135, 05-337, 03-109, CC DOCKETS 01-92, 96-45, GN DOCKET NO. 09-51, WT DOCKET NO. 10-208, BEFORE THE FEDERAL COMMUNICATION COMMISSION." The specific information considered confidential include: 1) The Filer's 5 year capital budget and network information associated with Service Quality Improvement Reporting (100), 2) Tribal

- Land Offerings documentation (900) and 3) ROR Additional Documentation which represents financial reports for calendar year 2013 (3005).
- (2) Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission. The information is required to be produced annually in accordance with 47 C.F.R. Section 54.313(a). The proceedings are WC Docket No. 10-90 and WC Docket No. 11-42.
- (3) Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged. The information requested for confidential treatment is information not customarily released to the public. Release of this information would have the effect of substantial harm to the competitive position of the Filer.
- (4) Explanation of the degree to which the information concerns a service that is subject to competition. All of the services provided by the Filer are subject to competition.
- (5) Explanation of how disclosure of the information could result in substantial competitive harm. Identification of network details could enable wrongdoers the ability to compromise network reliability to customers. In addition, competitive entities in the Filer's area would have access to sensitive network, strategic and financial details that would hamper the Filer's ability to effectively compete.
- (6) Identification of any measures taken by the submitting party to prevent unauthorized disclosure. The information filed is not customarily released to the public or publically made available within the telecommunications industry. The information is also only released within internal circulation, including its attorneys, consultants and engineers, held to confidentiality agreements. The request as well as the associated documents subject to it, are filed both paper copy as well as electronically.
- (7) Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties. None of the information requesting confidential treatment is available to the public and have not been disclosed to parties unless those parties are engaged to perform services for the Filer, under nondisclosure.
- (8) Justification of the period during which the submitting party asserts that material should not be available for public disclosure. Due to the fact that the nature of the information being filed is sensitive in terms of competitive and public safety concerns, the Filer requests that confidential treatment be granted indefinitely.

#### II. CONCLUSION

For these reasons, pursuant to Sections 0.457 and 0.459 of the Commission's rules, the Filer requests that the portions of Form 481 relating to those particular items listed in I.1, above, be treated as confidential under the Commission's rules and precedent and withheld from public inspection and that any distribution of them within the Commission should be limited, in accordance with the reasons stated for confidential request. In the case where any person, party or entity wishes to access any of this information, the Filer requests immediate notification so it can have the opportunity to oppose the request or consider any other action it deems necessary to protect both its network, strategic and financial interests and the interest of the customers it continues to serve.

Respectfully Submitted,

Name - Steve Guest

Address - 223 Broadway, Davenport, OK 74026

Filer name – Central Cellular L.L.C., dab COTC Connections

Number - 918-377-2241

June 20, 2016

	FCC Form 481
FCC Form 481 - Carrier Annual Repo	orting OMB Control No. 3060-0986/OMB Control No. 3060-0819
Data Collection Form	July 2013

<010> Study Area Code
<015> Study Area Name
CENTRAL CELLULAR LLC



-	ervice Quality Improvement Reporting Illection Form		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	439015	
<015>	Study Area Name	CENTRAL CELLULAR LLC	
.110	Harvey and the FTC and fine time from the FCC2		
<110>	Has your company received its ETC certification from the FCC?  If your answer to Line <110> is yes, do you have an existing §54.202(a) "5		
<111>	year plan" filed with the FCC?		
	The first state of the state of		-
	If your answer to Line <111> is yes, please file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.		
<112>	Attach Five-Year Service Quality Improvement Plan or, in subsequent years your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If yo CETC which only receives frozen support, your progress report is only		
	required to address voice telephony service.		
		-	-
	Please select the appropriate responses below (Yes, No, Not Applicable) to contain the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to §54.202(a). The information structure at the wire center level or census block as appropriate	S	
<113>	Maps detailing progress towards meeting plan targets		
<114>	Report how much universal service (USF) support was received		
<115>	How much (USF) was used to improve service quality and how support was used to in	mprove service quality	
<116>	How much (USF) was used to improve service coverage and how support was used to	improve service coverage	
<117>	How much (USF) was used to improve service capacity and how support was used to	· ·	
<118>	Provide an explanation of network improvement targets not met in the prior calendar year.		

(200) Sen	vice Outage Reporting (Voice)		FCC Form 481
	ection Form		OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
	Study Area Code	439015	
<015>	Study Area Name	CENTRAL CELLULAR LLC	
<210>	For the prior calendar year, were there any	reportable voice service outages?	
<220>	To the prior ediched year, were there any		<del></del>
\220>			

(300) Unfulfilled Service Request  Data Collection Form		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010> Study Area Code	439015	
<015> Study Area Name	CENTRAL CELLULAR LLC	
<300> Unfulfilled service request (voice)		
210. Detail on attampts (unica)		
<310> Detail on attempts (voice)		
<320> Unfulfilled service request (broadband)		
<330> Detail on attempts (broadband)		

(400) Number of Complaints per 1,000 customers	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010>	Study Area Code	439015
<015>	Study Area Name	CENTRAL CELLULAR LLC

Select from the drop-down list to indicate how you would like to report voice complaints (zero or greater) for voice telephony service in the prior <400> calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. <410> Complaints per 1000 customers for fixed voice <420> Complaints per 1000 customers for mobile voice Select from the drop-down list to indicate how you would like to report end-user customer complaints (zero or greater) for broadband service in <430> the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. <440> Complaints per 1000 customers for fixed broadband <450> Complaints per 1000 customers for mobile broadband

(600) Functionality in Emergency Situations

Data Collection Form

OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

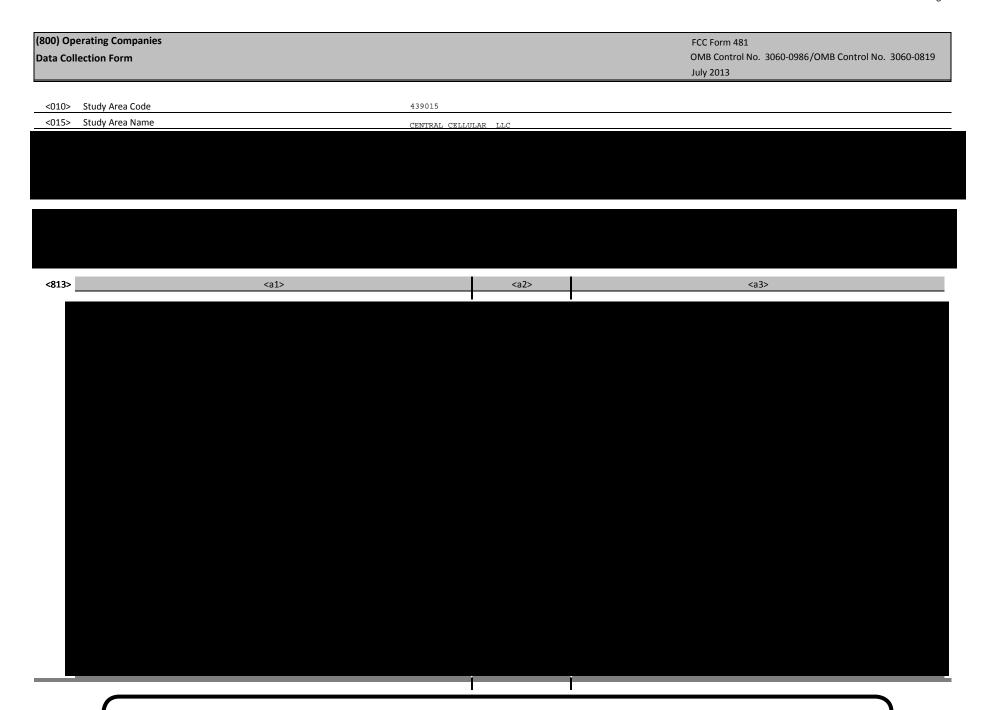
<010> Study Area Code 439015

15> Study Area Name CENTRAL CELLULAR

(700) Price Offerings including Voice Rate Data  Data Collection Form		FCC Form 481  OMB Control No. 3060-0986/OMB Control No. 3060-0819  July 2013
<010> Study Area Code	439015	
<015> Study Area Name	CENTRAL CELLULAR LLC	



(710) Broadbrand Price Offerings FCC Form 481 **Data Collection Form** OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013 439015 <010> Study Area Code <015> Study Area Name CENTRAL CELLULAR LLC



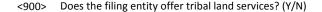
(900) Tribal Lands Reporting

Data Collection Form

OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

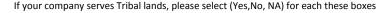
<010> Study Area Code 439015

CENTRAL CELLULAR LLC



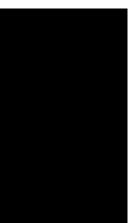
<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation



to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant t o  $\S$  54.313(a)(9) includes

- <921> Needs assessment and deployment planning with a focus on Tribal
- <922> Feasibulitiyaadchostiinstibulitynslanning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.



(1000) Voice and Broadband Service Rate Comparability	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010>	Study Area Code	439015
<015>	Study Area Name	CENTRAL CELLULAR LLC

<1010> Attach detailed description for voice services rate comparability compliance

<1020> Broadband comparability certification

<1030> Attach detailed description for broadband comparability compliance

Voice services rate comparability certification

<1000>



(1100) No Terrestrial Backhaul Reporting	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010> Study Area Code 439015

<015> Study Area Name CENTRAL CELLULAR LLC

<1100> Certify whether terrestrial backhaul options exist (Y/N)

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps

upstream within the supported area pursuant to § 54.313(g).



(1200) Te	erms and Condition for Lifeline Customers			FCC Form 481
Lifeline				OMB Control No. 3060-0986/OMB Control No. 3060-0819
Data Coll	lection Form			July 2013
•				
<010>	Study Area Code		439015	
<015>	Study Area Name		CENTRAL CELLULAR LLC	
-				
-				
-				
-				
			1	
<1210>	Terms & Conditions of Voice Telephony Lifeline Plans			
				Name of Attached Document
.4220:				
<1220>	Link to Public Website	HTTP		
		-		
	_			
<1221>	Information describing the terms and conditions of any voice			
	telephony service plans offered to Lifeline subscribers,			
<1222>	Details on the number of minutes provided as part of the plan,			
<1223>	Additional charges for toll calls, and rates for each such plan.			

(2000) Price Cap Carrier Additional Documentation	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers	July 2013

<010> Study Area Code	439015
<015> Study Area Name	CENTRAL CELLULAR LLC

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

#### **Incremental Connect America Phase I reporting**

<2010>	2nd Year Certification 47 CFR § 54.313(b)(1)(i) - Note that for the July 1
	2016 certification, this applies to Round 2 recipients of Incremental
	Support

- <2011> 3rd Year Certification 47 CFR § 54.313(b)(1)(ii) Note that for the July 1 2016 certification, this applies to Round 1 recipients of Incremental Support
- <2022> Recipient certifies, representing year two after filing a notice of acceptance of funding pursuant to 54.312(c), that the locations in question are not receiving support under the Broadband Initiatives Program or the Broadband Technology Opportunities Program for projects that will provide broadband with speeds of at least 4 Mbps/1Mbps 54.313(b)(2)(i). Round 2 recipients only.
- <2023> The attachment on line 2024 includes a statement of the total amount of capital funding expended in the previous year in meeting Connect America Phase I deployment obligations, accompanied by a list of census blocks indicating where funding was spent. This covers year two 54.313(b)(2)(ii). Round 2 recipients only.
- <2024A> Round 2 Recipient of Incremental Support?
- <2024B> Attach list of census blocks indicating where funding was spent in year two 54.313(b)(2)(ii). Round 2 recipients only.
- <2025A> Round 1 or Round 2 Recipient of Incremental Support?
- <2025B> Attach geocoded Information for Phase I milestone reports (Round 1 for year three and Round 2 for year two) Connect America Fund , WC Docket 10-90, Report and Order, FCC 13-

Name of Attached Document Listing Required Information

Name of Attached Document Listing Required Information

<2015> 2016 and future Frozen Support Certification 47 CFR § 54.313(c)(4)



(2000) Price Cap Carrier Additional Documentation (Continued)

**Data Collection Form** 

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

#### Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}

<2016> Certification support used to build broadband

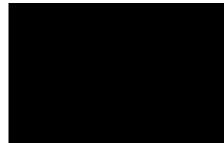
#### Connect America Phase II Reporting {47 CFR § 54.313(e)}

<2017A> Connect America Fund Phase II recipient?



<2017B> Attach information for Phase II - 54.313(e)(1) - list of geocoded locations already meeting the 54.309 public interest obligations at the end of calendar year 2015 and total amount of Phase II support, if any, the price

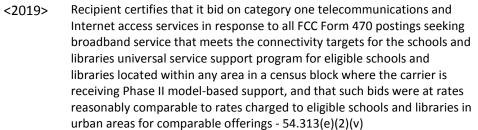
Name of Attached Document Listing Required Information

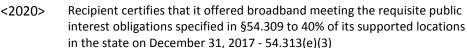


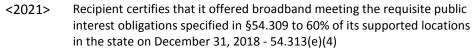
cap carrier used for capital expenditures in 2015.

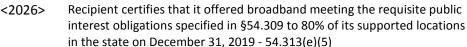
<2018> Attach the number, names, and addresses of community anchor institutions to which the carrier newly began providing access to broadband service in the preceding calendar year - 54.313(e)(2)(ii)

Name of Attached Document Listing Required Information

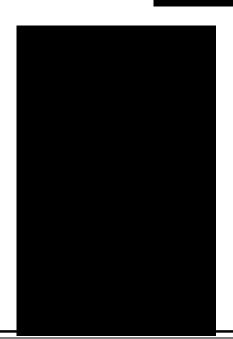








<2027> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 100% of its supported locations in the state on December 31, 2020 - 54.313(e)(6)



<010> Study Area Code
<015> Study Area Name
CENTRAL CELLULAR LLC
—

Complete the items below to note compliance with five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

Progress Report on 5 Year Plan

(3009)	Carrier certifies to 54.313(f)(1)(iii)	
(3010A)	Milestone Certification {47 CFR § 54.313(f)(1)(i)}	
(3010B)	Please Provide Attachment	Name of Attached Document Listing Requir Information
(3012A)	Community Anchor Institutions {47 CFR § 54.313(f)(1)(ii)}	
(3012B)	Please Provide Attachment	Name of Attached Document Listing Requir
(3013)	Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f)(2)}	Information (Yes/No)
(3014)	If yes, does your company file the RUS annual report	(Yes/No)
(3015)	Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:  Electronic copy of their annual RUS reports	
	(Operating Report for Telecommunications Borrowers)	
(3016)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows	
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required	Name of Attached Document Listing Required Information
(3018)	documentation If the response is no on line 3014, is your company audited? If the response is yes on line 3018, please check the boxes below to confirm your submission on line	(Yes/No)
(3019)	3026 pursuant to § 54.313(f)(2), contains: Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	
(3021)	Management letter and/or audit opinion issued by the independent certified public accountant that performed the company's financial audit. If the response is no on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:	
(3022)	Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers	
(3023)	Underlying information subjected to a review by an independent certified public accountant	
(3024)	Underlying information subjected to an officer certification.	
(3025)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	
(3026)	Attach the worksheet listing required information	Name of Attached Document Listing Required Information

(3005) Rate Of Return Carrier Additional Documentation (Continued)	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

 <010>
 Study Area Code
 439015

 <015>
 Study Area Name
 CENTRAL CELLULAR LLC

#### Financial Data Summary

(3027) Revenue

(3028) Operating Expenses

(3029) Net Income

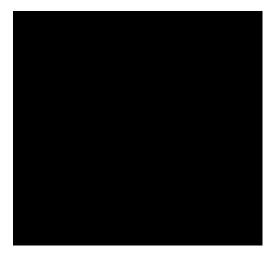
(3030) Telephone Plant In Service(TPIS)

(3031) Total Assets

(3032) Total Debt

(3033) Total Equity

(3034) Dividends



<010> <015>	Study Area Code	439015
<015>	Study Area Name	CENTRAL CELLULAR LLC

#### 4005 Rural Broadband Experiment

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations, provide a list of newly served community anchor institutions, and provide a list of locations where broadband has been deployed.

#### Public Interest Obligations - FCC 14-98 (paragraphs 26-29, 78)

Please address Line 4001 regarding compliance with the Commission's public interest obligations. All RBE participants must provide a response to Line 4001.

**4001**. Recipient certifies that it is offering broadband to the identified locations meeting the requisite public interest obligations consistent with the category for which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates for comparable offerings in urban areas?

#### Community Anchor Institutions - FCC 14-98 (paragraph 79)

**4003a**. RBE participants must provide the number, names, and addresses of community anchor institutions to which they newly deployed broadband service in the preceding calendar year. On this line, please respond (yes – attach new community anchors, no – no new anchors) to indicate whether this list will be provided.

#### If yes to 4003A, please provide a response for 4003B.

4003b. Provide the number, names and addresses of community anchor institutions to which the recipient newly began providing access to broadband service in the preceding calendar year.

Broadband Deployment Locations – FCC 14-98 (paragraph 80)

**4004a**. Attach a list of geocoded locations to which broadband has been deployed as of the June 1st immediately preceding the July 1st filing deadline for the FCC Form 481.

Name of Attached Document Listing Required Information

**4004b**. Attach evidence demonstrating that the recipient is meeting the relevant public service obligations for the identified locations. Materials must at least detail the pricing, offered broadband speed and data usage allowances available in the relevant geographic area.

Name of Attached Document Listing Required Information

Certification - Reporting Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010> Study Area Code	439015
<015> Study Area Name	CENTRAL CELLULAR LLC

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:



Certification - Agent / Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010> Study Area Code	439015
<015> Study Area Name	CENTRAL CELLULAR LLC

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

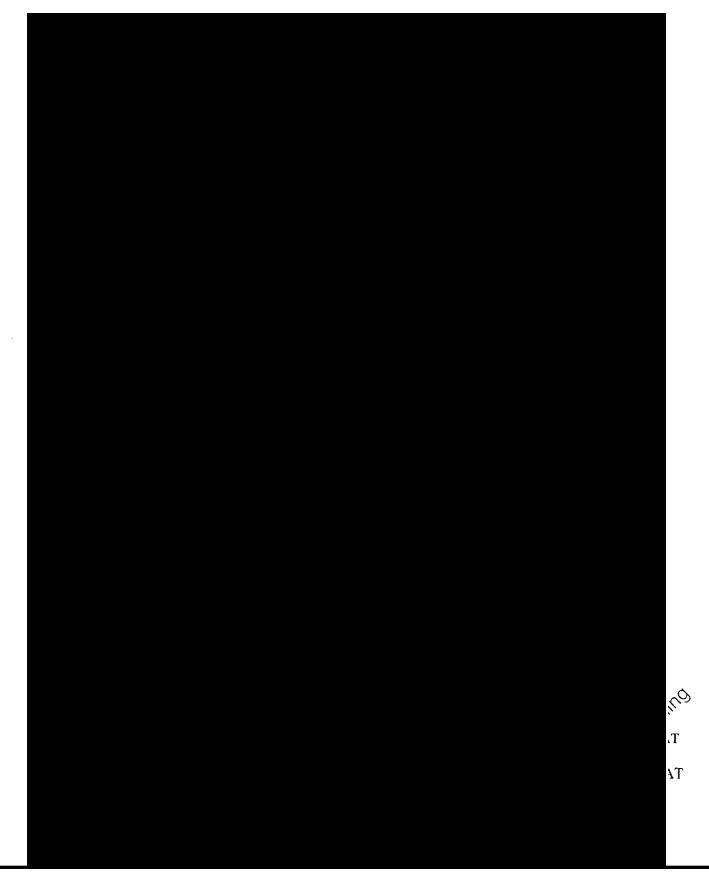


TO BE COMPLETED BY THE AUTHORIZED AGENT:



Attachments

(800) Op	erating Companies			FCC Form 481	
Data Col	lection Form			OMB Control No. 3060-0986/OMB Control No. 3060-0819	
				July 2013	
040					
<010> <015>	Study Area Code Study Area Name	439015			
<b>(013)</b>	Study Area Name	CENTRAL CELL	JULAR LLC		
				<a3></a3>	Ī
	Affiliat	es	SAC	Doing Business As Company or Brand Designation	
				I	



Oklahoma Tariff No. 1
First Revised Page 43

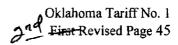
Central Cellular L.L.C. d/b/a COTC Connections

4.14 ELIGIBILITY REQUIREMENTS FOR LIFELINE SERVICE ON TRIBAL LANDS (Continued)

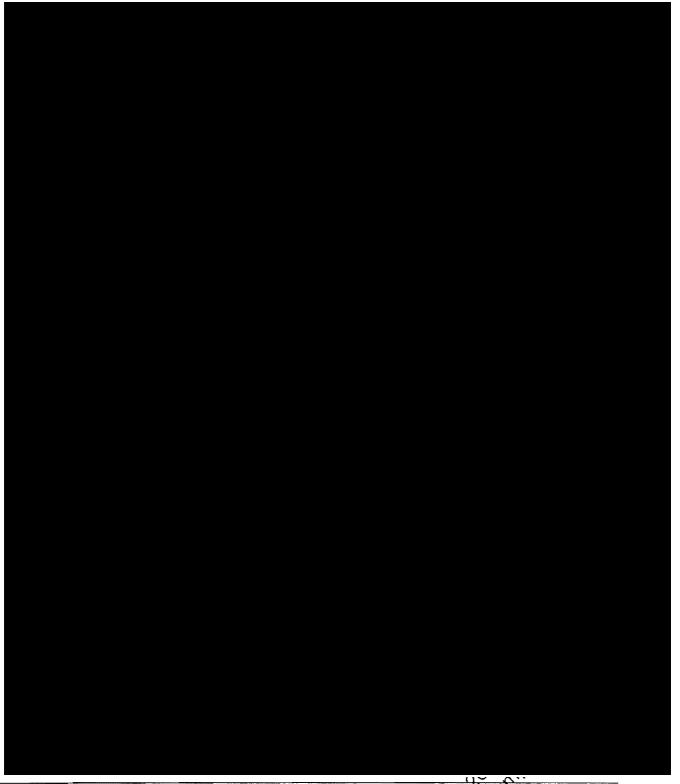


4.14 LIFELINE SERVICE ON TRIBAL LANDS (Continued)





#### 4.14 LIFELINE SERVICE ON TRIBAL LANDS (Continued)



Issued: 7-27-2012

Legal Authority: OAC 165:55-5-10(c)

Effective: \$1-2012